

**Emily Brown Rosen
Organic Research Associates
PO Box 5, Titusville NJ 08560**

**Comments to National Organic Standards Board
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Comments on Aquaculture Task Force Interim Final Report.

As a consumer of organic food, and a seafood lover, I appreciate the detailed proposal and considerable effort put forth by the Aquatic Task Force to craft these recommendations, which provide a detailed basis for further development of organic aquaculture standards.

I support the comments filed by the Center for Food Safety (CFS), in generally calling for strengthening the language to protect biodiversity, prevent environmental contamination, and reduce contamination of farmed fish products. I agree with the CFS opinion and the NOSB recommendation from October 2001, that it is not consistent with organic principles to certify organic wild fish, and that fish meal harvested from wild fish is not a sustainable practice. I also share CFS concerns with the allowance of net pens in the ocean, given the rate of escape, endangerment of native species, and potential for pollution due of the local ecosystem. I trust that the NOSB will carefully evaluate these potential problems, and work to create a recommendation that includes input from the environmental community, as well as the seafood industry.

One specific concern I have is that the Task Force suggested standards for farmed aquatic plant crops (205.528, p. 20, Aquatic Task Force Interim Final Report). The Federal Register Notice of January 24, 2005 that established the Task Force clearly states “the general objective of these task force groups is to develop draft organic standards for: (1) The production, handling and labeling of food and animal feed products derived from aquatic animals.” These proposals for aquatic crop standards should be discarded as they are beyond the scope of this Task Force. Of particular concern is the proposal that aquatic algae could be raised in ponds with only one year of transition, and that:

“205.528(b)(2) aquatic plants may be provided dissolved non-organic macro-nutrients and that: micro-nutrients, including trace metals, vitamins, and chelating compounds, where non-synthetic nutrients and compounds suitable for the algae species are not available; however, the dissolved amounts shall not exceed those necessary for healthy growth of the plants, and such culture media shall be disposed of in a manner that does not adversely impact upon the environment.”

This language permits the use of synthetic fertilizers for macronutrients, clearly prohibited in OFPA at 6508(b). There is no reason that aquatic plant production should allow for this use of synthetic fertilizers.

There is a serious need for clarification of aquatic crop standards, particularly for hydroponic systems, for algae production, and for terrestrial plants that grow in water. It would be very helpful if NOSB appoint a new Task Force or subcommittee to work in this area to facilitate development of uniform standards.